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August 25, 2022

**VIA ELECTRONIC FILING**

The Honorable Troy L. Nunley  
U.S. District Court, Eastern District of California  
501 I Street  
Sacramento, CA 95814

Re: **Sacramento Homeless Union v. County of Sacramento, et al.**  
Eastern District of California Case No. 2:22-cv-01095-TLN-KJN  
Matter ID: 22-0689  
Document No.: 1187687

Dear Judge Nunley:

Last night at 11:52 p.m., Plaintiffs electronically filed and served a Motion to Extend or Reinstate Preliminary Injunction against Defendant City of Sacramento with a Request for Sanctions against Defendant City of Sacramento. Defendant City respectfully requests that plaintiffs' motion be rejected by the court and/or denied based on plaintiffs' failure to comply with the provisions of Local Rule 231 and Federal Rule of Civil Procedure, Rule 65 relating to both notice of the motion and the scheduling of a hearing date for the motion. The Court will note plaintiffs' motion sets forth no date for a hearing, and therefore defendant City has been given no opportunity to file an opposition to plaintiffs' motion and no opportunity to appear at a hearing and present argument and evidence in opposition to plaintiffs' motion.

Defendant City also respectfully requests that plaintiffs' motion be denied based on plaintiffs' failure to include with their motion a proposed order that sets forth blanks for the time and date set for hearing of preliminary injunction, and the date for filing of responsive papers pursuant to Local Rule 231 (c)(7).

Respectfully submitted,

SUSANA ALCALA WOOD  
City Attorney

/s/ CHANCE L. TRIMM  
**CHANCE L. TRIMM**  
Senior Deputy City Attorney

CLT/caa

cc: Anthony D. Prince – Via Electronic Filing  
Diane Elizabeth McElhern – Via Electronic Filing  
Krista C. Whitman - Via Electronic Filing  
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